

REMARKS

I. INTRODUCTION

No new matter has been added. Thus, claims 1-12, 14, 15 and 17-20 remain pending in the present application. In view of the following remarks, it is respectfully submitted that all of the presently pending claims are allowable.

II. THE 35 U.S.C. § 112 REJECTIONS SHOULD BE WITHDRAWN

Claims 1-12, 14, 15 and 17-20 stand rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. (See 2/20/2008 Office Action, p. 2). Examiner asserts that the recitation in claims 1 and 10 “an orientation of each character within the text label remaining constant with respect to other characters in the text label as the text label is flipped” are insufficiently supported in the specification. (See *Id.*).

The first paragraph of 35 U.S.C. 112 provides:

The specification shall contain a *written description* of the invention, and of the manner and process of making and using it, in such full, clear, concise, and exact terms *as to enable any person skilled in the art to which it pertains*, or with which it is most nearly connected, to make and use the same, and shall set forth the best mode contemplated by the inventor of carrying out his invention.

MPEP 2163 states:

An applicant shows possession of the claimed invention by describing the claimed invention with all of its limitations using such descriptive means as words, structures, figures, diagrams, and formulas that fully set forth the claimed invention. *Lockwood v. American Airlines, Inc.*, 107 F.3d 1565, 1572, 41 USPQ2d 1961, 1966 (Fed. Cir. 1997).

Applicant respectfully submits that the recitation in claims 1 and 10 is supported in the specification in several locations. For example, the “underlying principle of the labeling of the square ‘Town Hall’ feature of figures 2A to 2H can be extended to labeling of different shapes as shown in figures 3A to 3M which from an initial orientation in figure 2A, a triangle feature is rotated anti-clockwise by 20°, 40°, 80°, 100°, 140°, 160°, 200°, 220°, 260°, 280°, 320°, and 340° respectively.” (See Specification p. 4, l. 21- p. 5, l. 2, Fig. 2A-2H, 3A-3N). From this example, it

can be seen that “an orientation of each character within the text label remaining constant with respect to other characters in the text label as the text label is flipped” as recited in claims 1 and 10. Therefore, the above recitation of the claims is disclosed in the specification of the present application. Thus, it is respectfully requested that the Examiner should withdraw the 35 U.S.C. § 112 rejection of claims 1-12, 14, 15 and 17-20.

III. **THE 35 U.S.C. § 103(a) REJECTIONS SHOULD BE WITHDRAWN**

Claims 1-12, 14, 15 and 17-20 stand rejected under 35 U.S.C. § 103(a) as unpatentable over Loughmiller, Jr. et al., U.S. Patent No. 4,914,605 (hereinafter “Loughmiller”), in view of Arakawa et al., U.S. Patent No. 5,297,051 (hereinafter “Arakawa”). (See 2/20/2008 Office Action, p. 3-9).

The Examiner admits that Loughmiller fails to disclose the recitation of “the orientation of the text label is flipped to ensure it remains upright when the text label one of approaches vertical, reaches vertical, and passes vertical.” However, the Examiner cites Arakawa to purportedly cure this deficiency. (See 2/20/08 Office Action, p. 4).

Claims 1 and 10 recite “an orientation of each character within the text label remaining constant with respect to other characters in the text label as the text label is flipped.” In contrast, Arakawa at most describes a method of displaying a text label such that each character is displayed vertically in a legible *order* on the screen. (See Arakawa, col. 6, ll. 20-22, Figs. 5-9). For example, comparing Fig. 5 with Fig. 6 of Arakawa, upon a 90-degree rotation of the map, each character in the text label “ROUTE1” is repositioned so that the characters are stacked one on top of the other such that each character remains vertical in the display and are in a legible *order*. Arakawa maintains a legible *order* of the vertical characters within the text label but this is not equivalent to maintaining a constant *orientation* of each character within the text label. For example, as illustrated in figures 2A to 2H, the text labels “Black Rd.” and “High St.” are rotated anti-clockwise and the *orientation* of each character within the text label remains constant with respect to other characters in the text label as the text label is flipped. This is clearly not equivalent to maintaining a legible *order* as in Arakawa. Thus, it is respectfully submitted that Arakawa does not disclose or suggest “an orientation of each character within the

text label remaining constant with respect to other characters in the text label as the text label is flipped,” as recited in claims 1 and 10.

Applicants further submit that Loughmiller does not cure the above-described deficiency of Arakawa with respect to claims 1 and 10. Accordingly, Applicants respectfully request that the Examiner should withdraw the 35 U.S.C. § 103(a) rejections of claims 1 and 10. As claims 2-9, 14, 15 and 19 depend from, and therefore include all the limitations of claim 1, it is respectfully submitted that these claims are also allowable for at least the same reasons given for claim 1. As claims 11, 12, 17, 18 and 20 depend from, and therefore include all the limitations of claim 10, it is respectfully submitted that these claims are also allowable for at least the same reasons given for claim 10.

CONCLUSION

In light of the foregoing, Applicants respectfully submit that all of the now pending claims are in condition for allowance. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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